



Natural Gas Vehicles for America

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Secretary James Kenney
New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Dr., Suite N4050
Santa Fe, NM 87505

Dear Secretary Kenney:

Natural Gas Vehicles for America (NGVAmerica) respectfully submits this letter to signify our support for a Clean Fuel Standard (CFS) program to be implemented in New Mexico that would enable additional revenue streams for New Mexico and clean jobs for New Mexicans, while reducing greenhouse gas and criteria pollutant emissions.

NGVAmerica is the national trade association dedicated to the decarbonization of the transportation sector through the increased use of gaseous fuels including renewable and conventional natural gas and, eventually, hydrogen. Our 200-plus member companies produce, distribute, and market natural gas and renewable natural gas (RNG, also called biomethane), manufacture and service natural gas vehicles (NGVs), engines, and equipment, and operate fleets powered by clean-burning gaseous fuels across North America.

NGVAmerica endorses strategies that support the transition to low-carbon transportation fuels, including conventional natural gas and RNG. Converting medium- and heavy-duty vehicle transportation networks to natural gas provides a readily available, proven and cost-effective solution to accelerate the transition to a low-carbon transportation future. Further, dedicating program resources to cleaner alternative fuel technologies that are available now will significantly and immediately benefit all communities by maximizing the displacement of older, higher emitting trucks and buses, including those higher emitting vehicles that operate in communities that are underserved by current transportation options.

A Clean Fuels Standard will reduce New Mexico's carbon emissions by requiring that transportation fuels with lower carbon intensities be used. A CFS promotes the blending of traditional fuels with renewable fuels to reduce emissions and provides credits for producers of low carbon intensity fuels that can be purchased to off-set the impact of high carbon intensity fuels. Also, a CFS is technology neutral allowing market forces to produce the best path to cleaner transportation in New Mexico.

By letting the market drive fuel choices based on decreasing the overall carbon footprint in transportation, new economic streams will arise that will provide new jobs for New Mexico's people. As an example, according to the recently released California Air Resources Board Updated Carbon Intensity

Advocating the increasing use of NGVs where they benefit most.
For the economy. For the environment. For health. For security. **For America.**

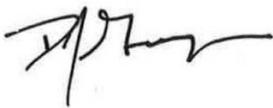
Fuel Scores, renewable natural gas (RNG) made from animal waste has the lowest carbon intensity of any fuel including electricity and hydrogen. New Mexico has an abundance of dairy and other animal farms that could produce RNG, a network of compressed natural gas (CNG) and liquefied natural gas (LNG) stations that can dispense RNG, and many natural gas vehicle models available today to use the RNG fuel to achieve comparable performance to gasoline and diesel vehicles but with a carbon negative footprint. Many fleets in New Mexico today already use NGVs and are continuing to expand.

California has a very successful Clean Fuel Standard Program, as does Oregon and now Washington. Many states are proposing a similar program including New York and Massachusetts and Minnesota, while several other states are in discussions and analysis to consider their own programs. NGVAmerica commends New Mexico for its leadership in 2021 and continuing into 2022 to advocate for a Clean Fuel Standard.

New Mexico has a history of supporting alternative fuel vehicles as the best path to building greater demand for New Mexico-produced clean fuel products, cleaning the environment by using lower emission vehicles in transportation, and providing economic benefit to the state and its constituents. Implementing a CFS in New Mexico will continue to enable the cleanest and best for purpose fuels to be used for transportation in New Mexico.

NGVAmerica welcomes the opportunity to provide further information and analysis on the environmental and economic benefits of natural gas vehicles and fuels. Please contact Jeff Clarke, NGVAmerica General Counsel & Regulatory Affairs Director at 202.824.7364 (jclarke@NGVAmerica.org), or Sherrie Merrow, NGVAmerica State Government Affairs Director at 303.883.5121 (smerrow@NGVAmerica.org) to set up a meeting and for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Gage', with a long horizontal flourish extending to the right.

Daniel J. Gage
President, NGVAmerica